

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

CHICAGO ORNAMENTAL IRON, INC., et al. )  
Plaintiffs, ) Case No. 1:25-cv-05131  
v. ) District Judge: Hon. Mary M.  
SELECTIVE INSURANCE CO. OF ) Rowland  
AMERICA, et al. ) Magistrate Judge: Hon. Young B.  
Defendants. ) Kim

**PLAINTIFFS' UNOPPOSED MOTION TO EXTEND MOTION TO COMPEL DATE**

Plaintiffs Chicago Ornamental Iron, Inc., 4340 W. 47th St. LLC, and 4340 Holdings LLC (collectively, “plaintiffs”), pursuant to Federal Rule of Civil Procedure 6(b) and Northern District of Illinois Local Rule 37.2, move unopposed to extend the deadline to file motions to compel discovery from November 21, 2025, to December 19, 2025. In support of this motion, plaintiffs state as follows.

1. Plaintiffs filed this four-count action on April 3, 2025, in the Circuit Court of Cook County, Illinois. The action arises from the roof collapse of plaintiffs' building following a heavy rainstorm and their resulting claim for insurance coverage. Plaintiffs allege that the total loss exceeded \$20 million. Plaintiffs assert claims against Selective, the defendant insurer, for breach of contract (Count I), violation of the Illinois Insurance Code (Count II), and violation of the Illinois Consumer Fraud Act (Count III). Plaintiffs assert a claim against AssuredPartners, the defendant insurance broker, for professional negligence (Count IV).

2. On May 8, 2025, AssuredPartners removed the action to this Court based on diversity jurisdiction. (ECF No. 1.)

3. Both defendants answered plaintiffs' complaint and asserted affirmative defenses. (ECF Nos. 4, 16.)

4. The parties have been at issue on the pleadings since May 22, 2025.

5. On September 26, 2025, the Court entered an order setting an October 24, 2025, deadline for the filing of motions to compel by all parties. (ECF No. 43.) The order also struck the unexpired discovery deadlines set forth in the Court's June 4, 2025, order (ECF No. 21).

6. On October 21, 2025, the parties notified the Court that they had met and conferred regarding outstanding discovery issues, agreed to supplement discovery responses, and jointly requested that this Court extend the deadline for the filing of motions to compel. (ECF No. 44).

7. The Court granted the parties' joint motion for extension of time to file motions to compel until November 21, 2025. (ECF No. 45).

8. The parties have continued to work diligently and cooperatively throughout discovery to supplement responses and resolve disputes informally.

9. In the course of supplementing their written discovery responses, plaintiffs' counsel discovered on November 10, 2025, that a tranche of documents collected from plaintiffs had not been uploaded to counsel's document review platform for review or production. This tranche consists of approximately 10,000 documents.

10. Upon discovering this gap, plaintiffs' counsel immediately informed counsel for the defendants and began the process of uploading, processing, and reviewing these documents for production to defendants.

11. All parties have conferred, and defendants do not object to plaintiffs' motion to extend the deadline for the filing of motions to compel.

12. A four-week extension to December 19, 2025, is appropriate under the circumstances to allow plaintiffs to complete their supplemental production and to allow all parties adequate time to meet and confer regarding any remaining discovery disputes before filing motions to compel.

13. No party will be prejudiced by this extension. Granting the extension promotes judicial efficiency by ensuring that any motions to compel are based on complete discovery responses.

Wherefore, plaintiffs Chicago Ornamental Iron, Inc., 4340 W. 47th St. LLC, and 4340 Holdings LLC, respectfully request that this Honorable Court extend the motion to compel deadline by 28 days to December 19, 2025.

Respectfully submitted,

By: /s/ Richard M. Goldwasser  
One of the Attorneys for Plaintiffs

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**CERTIFICATE OF SERVICE**

I hereby certify that on November 14, 2025, a true and correct copy of the foregoing document has been filed electronically and served on the parties via the Court's electronic filing system or by mail to anyone unable to accept electronic filings. Parties may access this filing through the Court's CM/ECF system.

/s/ Richard M. Goldwasser  
Richard M. Goldwasser